BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES

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Major Mallers Association's First Set Of Interrogatories And Requests For Production Of Documents To OCA Witness James F. Callow

Pursuant to Rules 25, 26, and 27 of the Commission's Rules of Practice, Major Mailers Association herewith submits the following interrogatories and document production requests to Office Of Consumer witness James F. Callow: MMA/OCA-T6-1-

5. If the designated witness is unable to answer any of these questions, please direct them to the appropriate witness who can provide a complete response.

Respectfully submitted,

Major Mailers Association

By:

Michael W. Hall 34693 Bloomfield Road Round Hill, Virginia 20141

540-554-8880 Counsel for

Major Mailers Association

Dated: Round Hill, VA June 9, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing discovery request upon the United States Postal Service, Ted P. Gerarden, the Designated Officer of the Commission, and participants who requested service of all discovery documents, in compliance with Rules 12, 26, and 27 of the Commission's Rules of Practice.

Dated this 9th day of April 2000.

Michael W. Hall

Major Mailers Association's First Set Of Interrogatories And Requests For Production Of Documents To OCA Witness James F. Callow

MMA/OCA-T6-1 Please refer to page 8 of your prepared testimony, specifically Table 1 and the graph identified as Figure 1, both entitled "Comparison Of First Class Letters And Total Average Cost Coverage." Please provide a similar table and graph showing, for the same time periods, the implicit cost coverages (separately) for First-Class Single Piece and First-Class Presorted Letters and the average total cost coverage.

MMA/OCA-T6-2 Please refer to page 9 of your prepared testimony, specifically Table 2 and the graph identified as Figure 2, both entitled "First Class Letter Mark-Up Index." Please provide a similar table and graph showing, for the same time periods, the implicit mark up indices (separately) for First-Class Single Piece and First-Class Presorted Letters.

MMA/OCA-T6-3 Please refer to page 11 of your prepared testimony, specifically Table 3 and the graphs identified as Figure 3, both entitled "First-Class Letter Cost Coverage Index." Please provide a similar table and graph showing, for the same time periods, the implicit cost coverage indices (separately) for First-Class Single Piece and First-Class Presorted Letters.

MMA/OCA-T6-4 Please refer to page 13 of your prepared testimony, specifically Table 4 and the graph identified as Figure 4, entitled respectively "Comparison Of First-Class Letter Mark-Up Index To Average And Recommended Mark-Up Indices" and "Comparison Of First-Class Letter Mark-Up Index To Average And Recommended." Please provide a similar table and graph showing, for the same time periods, the implicit mark-up indices (separately) for First-Class Single Piece and First-Class Presorted Letters, compared to the average and recommended mark-up indices.

MMA/OCA-T8-5 Please refer to page 14 of your testimony, specifically Table 5 and the graph identified as Figure 5, entitled respectively "Comparison Of First-Class Letter Cost Coverage Index To Average And Recommended Indices" and "Comparison Of First-Class Letter Cost Coverage Index To Average And Recommended.". Please provide a similar table and graph showing, for the same time periods, the implicit cost coverage indices (separately) for First-Class Single Piece and First-Class Presorted Letters, compared to the average and recommended cost coverage indices.